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Counsel for Plaintiff  
Christopher Boffoli

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHRISTOPHER BOFFOLI, an individual,

Plaintiff,

v.

JOHN STRAUB, an individual,

Defendant.

Case No.

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Christopher Boffoli, (“Boffoli” or “Plaintiff”) hereby alleges for his complaint against John Straub (“Straub” or “Defendant”) upon personal information as to Plaintiff’s own activities, and upon information and belief as to the activities of others, as follows:

**NATURE OF THE CASE**

1. This is a claim for copyright infringement arising under the copyright laws of the United States, Title 17 of the United States Code.

**JURISDICTION AND VENUE**

2. This Court has exclusive subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

3. On information and belief, Straub resides in San Clemente, California, which is located within the Central District of California. Thus, this Court has personal jurisdiction over Straub.

4. Venue is appropriate pursuant to 28 U.S.C. § 1391(b)(1–3).

**PARTIES**

5. Plaintiff is an individual and resident of the state of Washington.

6. Defendant is an individual and resident of the state of California.

**FACTS**

**A. Boffoli created copyrightable photographs and registered them with the U.S. Copyright Office.**

7. Boffoli is a fine art, editorial, and commercial photographer who created “Big Appetites,” a series of photographs featuring tiny figures photographed against real food backdrops. Big Appetites has been published in more than 100 countries around the world and has been featured in major publications such as the New York Times, Washington Post, NPR, and CBS This Morning, among many others.

8. Fine art photographs from Boffoli’s Big Appetites collection can be found in galleries and private collections in the US, Canada, Europe, and Asia. Boffoli is frequently hired by top advertising agencies and brands for commercial commissions based on his work. He also is hired by various publications for editorial commissions. Boffoli’s images frequently are licensed for publication in books, magazines, calendars, online publications, commercial websites, and greeting cards.

9. Boffoli’s business is based on licensing and selling the photographs he creates. Big Appetites fine art photographs are currently available for purchase at fine art galleries and have also been included in museum exhibitions in the US and abroad.

10. Boffoli registered each photograph in the Big Appetites series with the U.S. Copyright Office and has Copyright Registration Nos. VAu 1-106-484 (2011), VA0001948517 (2014), VAu 1-148-370 (2013), VAu 1-198-948 (2015), VAu 1-359-319 (2019), and VAu 1-490-001 (2022). A copy of these copyright registrations is attached as **Exhibit A**.

**B. Straub published and displayed on his websites copies of photographs from Big Appetites without license or permission from Boffoli.**

11. In or around February of 2025, Boffoli discovered that Straub was displaying images with content that infringes on Boffoli's copyrighted work (the "Infringing Content") on <<https://www.johnstraubimageworks.com>>. Boffoli later discovered that Straub was displaying further Infringing Content on <<https://myteenylife.com/>>.

12. The Infringing Content contained several photos that infringed Big Appetites without license or permission from Boffoli. A copy of the Infringing Content is provided as **Exhibit B.**

13. On information and belief, Straub also displays and sells copies of the Infringing Content at art fairs and exhibitions.

**C. Boffoli attempted twice to resolve Straub's infringement informally.**

14. On or about April 7, 2025, Boffoli, through counsel, sent a letter to Straub informing him of the Infringing Content and requesting that he cease infringement.

15. Boffoli sent another letter to Straub through counsel on or around May 16, 2025, offering to settle the matter of Straub's infringement.

16. Despite Boffoli's attempts at resolution, Straub did not cease displaying or selling the Infringing Content on his website or, on information and belief, at art fairs and exhibitions.

**CAUSE OF ACTION**  
(Copyright Infringement)

17. Boffoli hereby incorporates the preceding paragraphs as if fully set forth herein.

18. Boffoli is, and at all relevant times has been, the owner of the copyright in the photographs in the Big Appetites series.

19. Each photograph in Big Appetites is copyrightable subject matter under 17 U.S.C. § 102(a)(5).

20. Boffoli has complied in all respects with the provisions of the Copyright Act and all regulations thereunder.

1 21. Boffoli registered the copyright in each photograph in Big Appetites with the United  
2 States Copyright Office.

3 22. Boffoli has the exclusive rights under 17 U.S.C. § 106 to (1) reproduce the  
4 photographs in Big Appetites, (2) prepare derivative works based on Big Appetites, (3) distribute  
5 copies of Big Appetites, and (4) display Big Appetites publicly.

6 23. Without the permission or consent of Boffoli, a photograph or photographs infringing  
7 on Big Appetites were reproduced, copies were distributed of, and the photograph or  
8 photographs were displayed by Straub on his websites, and at art fairs and exhibitions.

9 24. Boffoli's exclusive rights in the photographs in Big Appetites were violated.

10 25. Straub had actual knowledge of the Infringing Content.

11 26. Straub acted willfully.

12 **RELIEF REQUESTED**

13 WHEREFORE, Boffoli asks this Court to enter judgment against Straub granting the  
14 following relief:

15 1. Temporary and permanent injunctions preventing and restraining infringement of  
16 Big Appetites by Straub under 17 U.S.C. § 502;

17 2. An order requiring the destruction of all copies made by or under the control of  
18 Straub of the photographs infringing on Big Appetites and all articles by which such copies may  
19 be reproduced under 17 U.S.C. § 503;

20 3. An award of the actual damages suffered by Boffoli as the result of Straub's  
21 infringement plus the profits attributable to the infringement under 17 U.S.C. § 504(b);

22 4. Alternatively, if Boffoli so elects, an award of statutory damages for each  
23 infringement of Big Appetites under 17 U.S.C. § 504;

24 5. A judgment that Straub's infringement was willful and an increased statutory damage  
25 award under 17 U.S.C. § 504(c)(2);

26 6. An award of Plaintiff's full costs including a reasonable attorney's fee under 17  
27 U.S.C. § 505; and  
28

7. For such other and further relief as may be just and proper under the circumstances.

Dated: July 11, 2025

Respectfully submitted,

NEWMAN LLP

/s/ Derek A. Newman

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Counsel for Plaintiff

Christopher Boffoli

**DEMAND FOR JURY TRIAL**

Pursuant to Fed. R. Civ. P. 38(b), Plaintiff Christopher Boffoli demands a trial by jury of all issues presented in this complaint which are triable by jury.

Dated: July 11, 2025

Respectfully submitted,

NEWMAN LLP

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